

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 22-20128-CR-BLOOM**

**UNITED STATES OF AMERICA**

**vs.**

**AMEKO ANTON JACQUES,**

**Defendant.**

/

**FACTUAL PROFFER**

The United States of America and Defendant Ameko Anton Jacques (“JACQUES”) agree that had this case proceeded to trial, the United States would prove beyond a reasonable doubt the following facts, among others, which occurred in the Southern District of Florida.

The night of August 20, 2021, Sergeant Maestre and Officer Iino of the Aventura Police Department were patrolling the Aventura Mall in a marked police vehicle. At approximately 10:00 pm, they heard a screech and saw sports cars drag racing around the perimeter. Sergeant Maestre was able to pull in front of one of the cars, a white Lamborghini SUV, and box it in.

The officers exited the patrol vehicle. Sergeant Maestre approached the driver side door of the SUV and Officer Iino approached the passenger side. The front windows to the SUV were open. Sergeant Maestre asked the driver, later identified as JACQUES, to step out of the SUV. JACQUES did. Sergeant Maestre asked JACQUES if he had any weapons in the car. “I don’t give consent,” JACQUES said, and walked around the rear of the SUV towards the passenger side.

Officer Iino told Jacques to sit down but JACQUES walked to the passenger side of the SUV. Sergeant Maestre told JACQUES not to go into the vehicle, but JACQUES reached into the window and then was placed into custody by Officer Iino.

Sergeant Maestre looked through the driver side window towards where JACQUES had reached and saw the butt of a firearm. Sergeant Maestre walked to the passenger side of the SUV and opened the door. On the floorboard, a firearm was being held up like a tripod by the barrel and two circular drums. There was no one else in the SUV.

An ATF Firearms Enforcement Officer examined the firearm in December 2021 and concluded it was a Glock, Model 19, Gen 5, 9mm caliber Luger firearm, serial number BSCF552, with a conversion device, with 95 9mm bullets. The ATF Officer test-fired the firearm at the range with commercially available 9mm bullets. The firearm discharged a five-round clip with a single trigger pull. JACQUES was not authorized by any federal or state authority to possess a machinegun.

The information contained in this proffer is not a complete recitation of all the facts and circumstances of this case, but the parties admit that it is sufficient to prove beyond a reasonable doubt a violation of Title 18, United States Code, Section 922(o)(1), that is, unlawful possession of a machine gun, as charged in the Indictment.

Date: 8/26/22 By: Juan Antonio Gonzalez  
JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY  
JONATHAN BAILYN  
ASSISTANT UNITED STATES ATTORNEY

Date: 8/26/22 By: Dustin Tischler  
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Date: 08/26/2022 By: Ameiko Anton Jacques  
AMEKO ANTON JACQUES  
DEFENDANT